

July 25, 2001

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S. W. Room TW-A325  
Washington, DC 20554

RE: Docket 94-102

Federal Communications Commission:

This correspondence is in reply to the Commission's Public Notice issued on July 10, 2001, requesting comments relating to a petition by the City of Richardson, Texas for a declaratory ruling on issues pertaining to the implementation of wireless Phase I & Phase II Enhanced 911 (E911) service. The Mid-America Regional Council administers the Kansas City regional 9-1-1 system and is responsible for coordinating implementation of Phase I and Phase II wireless in the Kansas City metropolitan area. The regional 9-1-1 system serves more than 1.7 million citizens in 8 counties and within 2 states.

The petition seeks clarification and/or a declaratory ruling concerning the process by which a PSAP makes a valid request for Phase II enhanced 911 service from a wireless carrier. We urge the commission to declare that a request submitted by a PSAP is valid as long as the PSAP will be able to receive and utilize the E9-1-1 data prior to the delivery of service by the carrier. We are concerned that an opposite ruling would require public agencies to spend thousands, perhaps even millions, of dollars to achieve readiness, only to have everything in place and gathering dust while the six-month request period passes. To require local governments to fund major equipment and software upgrades that will be unused for the first six months following its implementation seems unreasonable. In fact, if the Commission rules that agencies must have equipment and software installed before a request is considered valid, agencies may find themselves in need of an upgrade before the hardware or software is used to process one 9-1-1 call.

The Wireless Telecommunications Bureau seeks additional comment on what objective criteria a PSAP should be required to meet to demonstrate, at the time it makes a request, that it has taken sufficient steps to assure that it will be able to receive and utilize the E911 data prior to the delivery of service by the carrier. This requirement could be met by establishing that the local government has the necessary funding or funding source in place and that it has a vendor contract, or selection process, in place that will result in the installation of the necessary facilities within the 6 month period.

The Kansas City region plans to issue vendor contracts within the next few weeks for a multi-million dollar upgrade to all 9-1-1 equipment. This upgrade will support the implementation of Phase I and Phase II simultaneously. We urge the commission to allow our region to issue a valid Phase I and Phase II request as our equipment orders are issued. This action should allow our region to begin processing Phase II 9-1-1 calls within six months, or about the time it will take to install equipment at all 43 of our 9-1-1 centers. If the commission rules that PSAPs must be ready before it can issue a valid request for service to the wireless carrier the implementation time for the Kansas City region could be doubled.

**We strongly encourage the Commission to clarify its rules to consider a Phase I or Phase II request valid so long as the PSAP will be ready to receive and utilize the data within the six months following the request.**

Further, we encourage the Commission to support agencies moving directly to Phase I and Phase II E9-1-1 implementation simultaneously and not require a PSAP to implement Phase I E9-1-1 as a prerequisite.

Each PSAP is unique in that some cover rural areas, some cover urban areas and all have differing call volume. We ask the Commission to support each PSAP being able to determine their own method of "using" the Phase II wireless data. Although the Kansas City area plans to implement state-of-the-art mapping capability at each answering point, it would be inappropriate to require this level of implementation at each agency nationwide. The intent of locating a wireless 9-1-1 caller who needs lifesaving service can be achieved in many areas of the country without a sophisticated, expensive mapping system.

Sincerely,

Gregory S. Ballentine  
9-1-1 Program Manager

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